## REMARKS/ARGUMENTS

Claims 1 through 12 remain in this application as originally filed.

The examiner has acknowledged that claims 2-5 and 8-12 are directed to allowable subject matter if re-written in independent form including all of the limitations of the base claim and any intervening claims.

Claims 1, 6 & 7 stand rejected under U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,682,750 ("Preston et al."). According to the Office Action, Preston et al. disclose a self-contained delivery station for liquid natural gas (LNG) comprising: a storage tank (2), a pump (28), and meter (30) submerged in LNG within the tank, an outlet (31) of the pump (28) is connected to the inlet of the meter that is connected to a LNG delivery line (70) and a control valve (71) for restricting flow or thereby further metering of flow.

A problem addressed by Preston et al. is maintaining system pressure and Preston et al. disclose a solution whereby saturation coil valve (36) can be opened to direct some of the LNG from the pump discharge back to bulk storage tank (2), via saturation coil (34). LNG absorbs ambient heat and is warmed and/or vaporized when it flows through saturation coil (34) and when it is returned to bulk storage tank (2) it is bubbled upwardly through diffuser (13). In this way, heat is introduced into bulk storage tank (2), vaporizing some of the LNG and increasing the vapor pressure therein.

Accordingly, *Preston et al. disclose a system that is designed to increase vapor pressure by introducing heat into a large bulk storage tank*.

However, it is respectfully submitted that Preston et al. do not disclose the combination set out in claim 1 of the present application. Preston et al. disclose a pump

that draws LNG directly from the sump and do not disclose "a second pipe fluidly connecting suction inlet to the vapor within the storage tank." Instead, as described above. Preston et al. disclose an arrangement whereby the pump **discharge** is connected to a diffuser in the bulk storage tank. Preston et al. do not disclose an arrangement whereby "a mixture of liquid and vapor may be supplied from the bulk storage tank to the suction inlet," as recited in claim 1. Instead, Preston et al. disclose that, "Homogeneous phase LNG is advantageous because it permits accurate metering and measurement of the amount of fluid dispensed to the vehicle ..." (column 1, line 37). Preston et al. do not disclose a system that is capable of pumping a mixture of liquid and vapor from a storage tank to increase hold time and reduce venting that might be otherwise required if vapor is not pumped out to reduce the vapor pressure therein. That is, **Preston et al. do not disclose a system that is designed to reduce vapor** pressure by pumping vapor from a storage tank. Quite the opposite -- as discussed above, Preston et al. disclose a system designed to increase that is designed to increase vapor pressure by introducing heat into the bulk storage tank.

In view of the above comments, it is respectfully submitted that claims 1, 6 and 7 are patentable over Preston et al. The applicant respectfully requests that a timely Notice of Allowance be issued in this case.

## **Fee Payment and Authorization**

Please charge any fees due in connection with this submission and credit any overpayment to Deposit Account No. 13-0017.

Respectfully submitted,

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